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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	2:20-MJ-00052-AC
)	
Plaintiff,)	STIPULATION AND ORDER
)	CONTINUING PRELIMINARY
v.)	HEARING DATE
)	
RAYMOND LEON RODRIGUEZ,)	
)	Judge: Hon. Edmund F. Brennan
Defendant.)	
)	
)	
)	

STIPULATION

The United States, by and through its undersigned counsel, and the defendant, by and through his counsel of record, hereby stipulate as follows:

1. By prior order, this matter was set for Preliminary Hearing on March 27, 2020.
2. By this Stipulation, the parties now move to continue the Preliminary Hearing until May 15, 2020, at 2:00 p.m.
3. The defendant made his initial appearance on March 11, 2020.
4. The defendant is presently released on pretrial supervision pending trial in this matter.

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- 1 5. On March 23, 2020, the United States provided 68 pages of reports related to the
2 criminal investigation of the defendant. Counsel for the defendant needs time to
3 review the reports, conduct defense investigation, and consult with the defendant.
- 4 6. Additionally, the parties have discussed potential pre-indictment resolution of this
5 matter. The parties need further time to discuss this matter, discuss any potential
6 consequences, and to allow counsel for the defendant reasonable time necessary for
7 preparation and further investigation.
- 8 7. The defendant understands that pursuant to 18 U.S.C. § 3161(b), “any information
9 or indictment charging an individual with the commission of an offense shall be
10 filed within thirty days from the date on which such individual was arrested.” Time
11 may be excluded under the Speedy Trial Act if the Court finds that the ends of
12 justice served by granting such a continuance outweigh the best interests of the
13 public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). The parties
14 jointly move to exclude time within which any indictment or information shall be
15 filed from the date of this order, through and including May 15, 2020, pursuant to
16 18 U.S.C. § 3161(h)(7)(B)(iv), because failure to do so would “deny counsel for the
17 defendant . . . the reasonable time necessary for effective preparation, taking into
18 account the exercise of due diligence.”
- 19 8. Good cause exists under Rule 5.1(d) of the Federal Rules of Criminal Procedure.

20 **IT IS SO STIPULATED.**

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22 DATED: March 24, 2020

23 /s/ Justin L. Lee
JUSTIN L. LEE
Assistant U.S. Attorney

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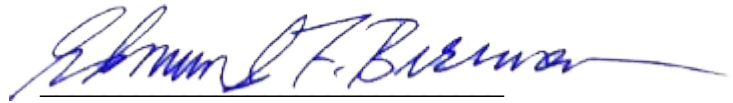
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1 DATED: March 24, 2020

2 /s/ Philip Cozens
3 PHILIP COZENS
4 Attorney for Raymond Rodriguez
5 (as authorized on March 24, 2020)

6 **ORDER**

7 IT IS SO FOUND AND ORDERED, this 25th day of March, 2020.

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10 Hon. EDMUND F. BRENNAN
11 United States Magistrate Judge
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